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January 5, 2011

JAN 1 1 2011 APCO

Mr. Jeremy Duis Bureau of Air and Radiation Kansas Department of Health and Environment 1000 SW Jackson, Suite 310 Topeka, KS 66612-1366

**RE:** Notification of Compliance Status

40 CFR Part 63 Subpart BBBBBB Gasoline Distribution Area Source Rule Magellan Pipeline Company, L.P. – St. Joseph Terminal

Dear Mr. Duis:

Per the requirements of 63.9(h), Magellan Pipeline Company, L.P. provides Notification of Compliance Status of 40 CFR Part 63 Subpart BBBBB (National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities) for the St. Joseph Terminal in Wathena, Kansas.

40 CFR Part 63 Subpart BBBBB was promulgated on January 10, 2008. The St. Joseph Terminal is an existing source under the requirements of this rule. The facility complies with all of the requirements of the new regulation. Attached is additional information required under 40 CFR 63.9(h) for the Notification of Compliance Status.

| 40 CFR 63.9(h) - Notification Requirements  | Compliance Methods   |
|---|--|
| (h)(2)(i) – Notice of Compliance Status (NOCS) must be signed by the responsible official.  | Attachment I includes a signed statement of certification.   |
| (h)(2)(i)(A) The methods that were used to determine compliance.  | Attachment II provides compliance methods for each part of the regulation.   |
| (h)(2)(i)(B) The results of any performance tests, opacity or visible emission observations, continuous monitoring system (CMS) performance evaluations, and/or other monitoring procedures or methods that were conducted. | Monitoring is not required because gasoline loading is limited by permit to less than 250,000 gal/day. Therefore, there is no emission control required for the loading rack. The rack is designed for submerged filling of cargo tanks. |
| (h)(2)(i)(C) The methods that will be used for determining continuing compliance, including a description of monitoring and reporting requirements and test methods.  | Copies of the following documents are attached as indicated:  • Monthly Facility Leak Inspection form - Attachment III  • Annual In-service Tank Floating Roof and Seal Inspection form - Attachment IV                                  |

| 40 CFR 63.9(h) - Notification Requirements  | Compliance Methods  |  |  |
|---|---|--|--|
|   | Out-Of-Service Tank Floating Roof and Seal  |  |  |
|   | Inspection form - Attachment V  |  |  |
| (h)(2)(i)(D) The type and quantity of hazardous air   | The St. Joseph Terminal is a minor source for VOC an  |  |  |
| pollutants emitted by the source (or surrogate  | HAP emissions. The HAP emitted are benzene, ethyl   |  |  |
| pollutants if specified in the relevant standard),  | benzene, toluene, 2,2,4-trimethylpentane, n-hexane, and   |  |  |
| reported in units and averaging times and in  | xylene. Averaging times are not applicable.   |  |  |
| accordance with the test methods specified in the   |   |  |  |
| relevant standard.  |   |  |  |
| (h)(2)(i)(E) If the relevant standard applies to both   | Not applicable. The GACT rule applies only to area/minor  |  |  |
| major and area sources, an analysis demonstrating   | HAP sources.  |  |  |
| whether the affected source is a major source (using  | =   |  |  |
| the emissions data generated for this notification).  |   |  |  |
| (h)(2)(i)(F) A description of the air pollution control   | Emission controls are not required for the loading rack   |  |  |
| equipment (or method) for each emission point,  | because gasoline loading is limited by permit to less than  |  |  |
| including each control device (or method) for each  | 250,000 gal/day. The rack is designed for submerged filling of cargo tanks. Control equipment for each gasoline storage |  |  |
| hazardous air pollutant and the control efficiency (percent) for each control device (or method). | tank is a floating roof with seals. For fugitive emissions  |  |  |
| (percent) for each control device (or method).  | from equipment in gasoline service, the control method is a   |  |  |
|   | leak inspection and repair program.   |  |  |
| (h)(2)(i)(G) A statement by the owner or operator of  |   |  |  |
| the affected existing, new, or reconstructed source as  | the St. Joseph Terminal is in compliance with all   |  |  |
| to whether the source has complied with the relevant  | requirements of this rule.  |  |  |
| standard or other requirements.   | 1 requirements of this fate.  |  |  |
| Standard of Other requirements.   | <u>                                     </u>  |  |  |

If you have any questions or require additional info, please contact me at 918/574-7657 or grant.clemons@magellanlp.com.

Sincerely,

Grant Clemons
Air Specialist

Attachments

cc:

EPA Region VII

Director, Air, RCRA, and Toxics Division U.S. Environmental Protection Agency

901 N. 5th Street Kansas City, KS 66101

File/Air Quality/St. Joseph Terminal St. Joseph Terminal/File/Air Quality

# ATTACHMENT I Certification of Accuracy

#### Certification of Accuracy by a Responsible Official Notice of Compliance Status

### 40 CFR Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories Subpart BBBBB - Gasoline Distribution Area Source Rule

Source Name: St. Joseph Terminal – Wathena, Kansas

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on information and belief formed after reasonable inquiry, including the person or persons who manage the system, or those persons directly responsible for gathering the information, the stated information in this document is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Name of Responsible Official: Michael Pearson

Title: V.P. Operations

| Signature: | Michael Pearson |
|------------|-----------------|
| Date:      | 4(11            |

# ATTACHMENT II Notice of Compliance Status Table

| Applicable Requirement Description  | Method(s), information, or facts used to determine the compliance status  | Is the facility in<br>Compliance with<br>the Applicable<br>Requirements?  |
|---|---|---|
| 63.11087 - What requirements must I meet for gasolin  | e storage tanks if my facility is a bulk gasoline term  | ninal?  |
| <ul> <li>(a)You must meet each emission limit and management practice in Table 1 to this subpart that applies to your gasoline storage tank. Table 1 states:</li> <li>1. Each gasoline storage tank with a capacity less than 75 m³ shall be equipped with a fixed roof that is mounted to the storage tank in a stationary manner, and maintain all openings in a closed position at all times when not in use.</li> </ul>   | (a)1. The St. Joseph Terminal has no gasoline storage tank with capacity less than 75 m <sup>3</sup> .  | (a)1. – Yes.  |
| 2. Each gasoline storage tank with a capacity greater than or equal to 75 m³ shall:  (a) Reduce emissions of total organic HAP or TOC by 95 weight-percent with a closed vent system and control device as specified in §60.112b(a)(3) of this chapter; or  (b) Equip each internal floating roof gasoline storage tank according to the requirements in §60.112b(a)(1) of this chapter, except for the secondary seal requirements under §60.112b(a)(1)(ii)(B) and the requirements in §60.112b(a)(1)(iv) through (ix) of this chapter; and  (c) Equip each external floating roof gasoline storage tank according to the requirements in §60.112b(a)(2) of this chapter, except that the requirements of §60.112b(a)(2)(ii) of this chapter shall only be required if such storage tank does not currently meet the requirements of §60.112b(a)(2)(i) of this chapter; or  d) Equip and operate each internal and external floating roof gasoline storage tank according to the applicable requirements in §63.1063(a)(1) and (b), and equip each external floating roof gasoline storage tank according to the requirements of §63.1063(a)(2) if such storage tank does not currently meet the requirements of §63.1063(a)(2) if such storage tank does not currently meet the requirements of §63.1063(a)(1). | (a)2. The St. Joseph Terminal has one (1) gasoline storage tanks with capacity greater than 75 m <sup>3</sup> . This is Tank No. 1431.  Tank No. 1431 is an internal-floating roof tank equipped with a mechanical shoe primary seal. | (a)2. Tank No. 1431 is compliant w/(a)(2)(b): As allowed under (b) below, final verification of control equipment will be determined prior to January 10, 2018. |
| 3. Each surge control tank shall be equipped with a fixed roof that is mounted to the tank in a stationary manner and with a  | (a)3. The St. Joseph Terminal has no surge control tank.  | (a)3. Yes.  |

| Applicable Requirement Description   | Method(s), information, or facts used to determine the compliance status   | Is the facility in<br>Compliance with<br>the Applicable<br>Requirements?   |
|--|--|--|
| pressure/vacuum vent with a positive cracking pressure of no less than 0.50 inches of water. Maintain all openings in a closed position at all times when not in use.  |  |  |
| (b) You must comply with the requirements of this subpart by the applicable dates specified in §63.11083, except that storage vessels equipped with floating roofs and not meeting the requirements of paragraph (a) of this section must be in compliance at the first degassing and cleaning activity after January 10, 2011 or by January 10, 2018, whichever is first. | (b) As allowed under this section, compliance with the requirements of 60.112b(a)(1) and (a)(2) for Tank No. 1431 will be verified during the next degassing event, but no later than January 10, 2018.  | (b) Yes. As allowed, final verification of control equipment for Tank No. 1431 will be determined prior to January 10, 2018. |
| (c) You must comply with the applicable testing and monitoring requirements specified in §63.11092(e).   | (c) – For Tank No. 1431, compliance with the requirements of 63.11087(c) will be verified during the next degassing event, but no later than January 10, 2018.  - Tank No. 1431: MPC personnel will conduct annual through-the-hatch inspections as required. They will repair any defects identified during the inspections, or they will empty the tank and remove it from service within 45 days. An internal inspection will be completed every time the tank is emptied and degassed. If the internal floating roof or seal has defects, the owner or operator shall repair the items before refilling the storage vessel. In no event shall up close inspections conducted in accordance with this provision occur at intervals greater than 10 years. | (c) Yes.   |
| (d) You must submit the applicable notifications as required under §63.11093.  | (d) Initial notification was submitted as required. This report serves as Notice of Compliance Demonstration.  | (d) Yes.   |
| (e) You must keep records and submit reports as specified in §§63.11094 and 63.11095.  | (e) Recordkeeping. For Tank No. 1431: Once the out of service inspection has occurred sometime before January 10, 2018, MPC will furnish the   | (e) Yes.   |

| Applicable Requirement Description   | Method(s), information, or facts used to determine the compliance status  | Is the facility in<br>Compliance with<br>the Applicable<br>Requirements? |
|--|---|--|
|  | Administrator with a report that describes the control equipment and certifies that the control equipment complies with Subpart BBBBB requirements.  - Facility personnel will maintain records to document every inspection and seal-gap measurement performed at Tank No. 1431.  - Tank No. 1431: If any of the conditions described in §60.113b(a)(2) are detected during the annual visual inspection a report will be furnished to the Administrator within 30 days of the inspection.  (b) MPC will submit an excess emissions report should excess emissions be identified during any inspection of Tank No. 1431. |  |
| (f) If your gasoline storage tank is subject to, and complies with, the control requirements of 40 CFR Part 60, subpart Kb of this chapter, your storage tank will be deemed in compliance with this section. You must report this determination in the Notification of Compliance Status report under §63.11093(b). | (f) Tank No. 1431 was not subject to NSPS Subpart Kb prior to GACT.   | (f) Yes  |
| 63.11088 – What requirements must I meet for gasolin   | e loading racks if my facility is a bulk gasoline tern  | ninal?   |
| (a) You must meet each emission limit and management practice in Table 2 to this subpart that applies to you.  | (a) Emission controls are not required for the loading rack at the St. Joseph Terminal because gasoline loading is limited by permit to less than 250,000 gal/day. The rack is designed for submerged filling of cargo tanks.   | (a) Yes  |
| (b) As an alternative for railcar cargo tanks to the requirements specified in Table 2 to this subpart, you may comply with the requirements specified in §63.422(e).  | (b) No railcar loading occurs at this facility.   | (b) Yes  |
| (c) You must comply with the requirements of this subpart by the applicable dates specified in §63.11083.  | (c) The St. Joseph Terminal is an existing affected source. Compliance with the requirements of   | (c) Yes  |

| Applicable Requirement Description   | Method(s), information, or facts used to determine the compliance status   | Is the facility in<br>Compliance with<br>the Applicable<br>Requirements? |
|--|--|--|
|  | §63.11088 for the loading rack was verified by records review. The loading rack is in compliance with all requirements of this subpart.  |  |
| (d) You must comply with the applicable testing and monitoring requirements specified in §63.11092.  | (d) Monitoring is not required because gasoline loading is limited by permit to less than 250,000 gal/day.   | (d) Yes  |
| (e) You must submit the applicable notifications as required under §63.11093.  | (e) MPC has submitted all notifications as required.   | (e) Yes  |
| (f) You must keep records and submit reports as specified in §§63.11094 and 63.11095.  | (f) Recordkeeping: MPC maintains records to document gasoline throughput. Reporting: MPC will submit semi-annual compliance reports. MPC will submit an excess emissions report whenever an MPC inspector identifies excess emissions.       | (f) Yes  |
| 63.11089 – What requirements must I meet for equipmen  | nt leak inspections if my facility is a bulk gasoline to   | erminal?   |
| (a) Each owner or operator of a bulk gasoline terminal, bulk plant, bulk gasoline terminal, or pipeline pumping Terminal subject to the provisions of this subpart shall perform a monthly leak inspection of all equipment in gasoline service, as defined in §63.11100. For this inspection, detection methods incorporating sight, sound, and smell are acceptable. | (a) MPC personnel will conduct visual leak inspections of all equipment in gasoline service using sight, sound, and smell. MPC will conduct those inspections no later than the last day of each month.                                      | (a) Yes  |
| (b) A log book shall be used and shall be signed by the owner or operator at the completion of each inspection. A section of the log book shall contain a list, summary description, or diagram(s) showing the location of all equipment in gasoline service at the facility.  | (b) A log book containing the inspection forms shall be maintained on-site. A drawing showing the specific areas to be inspected will be included in the log book. Inspectors shall identify and describe all leaks on the inspection forms. | (b) Yes  |
| (c) Each detection of a liquid or vapor leak shall be recorded in the log book. When a leak is detected, an initial attempt at repair shall be made as soon as practicable, but no later than 5 calendar days after the leak is detected. Repair or replacement of leaking equipment shall be completed within 15 calendar days after detection of each leak, except   | (c) Each detection of a leak shall be recorded in the log book and repaired within 15 days.  | (c) Yes  |

| Applicable Requirement Description  | Method(s), information, or facts used to determine the compliance status   | Is the facility in Compliance with the Applicable Requirements? |
|---|--|---|
| as provided in paragraph (d) of this section.   |  |   |
| (d) Delay of repair of leaking equipment will be allowed if the repair is not feasible within 15 days. The owner or operator shall provide in the semiannual report specified in §63.11095(b), the reason(s) why the repair was not feasible and the date each repair was completed.  | (d) Any delay of repair will be noted as required.   | (d) Yes   |
| (e) You must comply with the requirements of this subpart by the applicable dates specified in §63.11083.   | (e) The facility is in compliance with all requirements of this regulation.  | (e) Yes   |
| (f) You must submit the applicable notifications as required under §63.11093.   | (f) All notifications have been submitted as required.   | (f) Yes   |
| (g) You must keep records and submit reports as specified in §§63.11094 and 63.11095.   | (g) Recordkeeping – (d) A log book containing the inspection forms shall be maintained on-site. A drawing showing the specific areas to be inspected will be included in the log book. A summary description of any leaks will be indicated on the inspection form to identify the leak.  Reporting - (a) The facility shall submit a semiannual compliance reports noting any leaks not repaired within 15 days. (b) Each owner or operator of an affected source subject to the control requirements of this subpart shall submit an excess emissions report if an excess emission is identified during any inspections. | (g) Yes   |
|   | nitoring requirements must I meet?   |   |
| <ul> <li>(a) Each owner or operator subject to the emission standard in §63.11088 for gasoline loading racks must comply with the requirements in paragraphs (a) through (d) of this section.</li> <li>(a)(1) Conduct a performance test on the vapor processing and collection systems according to either paragraph (a)(1)(i) or paragraph</li> </ul> | (a) A performance test is not required because gasoline loading is limited by permit to less than 250,000 gal/day. Therefore, there is no emission control required for the loading rack.  | (a) Yes   |

| Applicable Requirement Description  | Method(s), information, or facts used to determine the compliance status | Is the facility in<br>Compliance with<br>the Applicable<br>Requirements? |
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| (a)(1)(ii) of this section.   |  |  |
| (a)(1)(i) Use the test methods and procedures in §60.503 of this chapter, except a reading of 500 parts per million shall be used to determine the level of leaks to be repaired under §60.503(b) of this chapter.  |  |  |
| (a)(1)(ii) Use alternative test methods and procedures in accordance with the alternative test method requirements in §63.7(f).   |  |  |
| (a)(2) If you are operating your gasoline loading rack in compliance with an enforceable State, local, or tribal rule or permit that requires your loading rack to meet an emission limit of 80 milligrams (mg), or less, per liter of gasoline loaded (mg/l), you may submit a statement by a responsible official of your facility certifying the compliance status of your loading rack in lieu of the test required under paragraph (a)(1) of this section.   |  |  |
| (a)(3) If you have conducted performance testing on the vapor processing and collection systems within 5 years prior to January 10, 2008, and the test is for the affected facility and is representative of current or anticipated operating processes and conditions, you may submit the results of such testing in lieu of the test required under paragraph (a)(1) of this section, provided the testing was conducted using the test methods and procedures in §60.503 of this chapter. Should the Administrator deem the prior test data unacceptable, the facility is still required to meet the requirement to conduct an initial performance test within 180 days of the compliance date specified in §63.11083; thus, previous test reports should be submitted as soon as possible after January 10, 2008. |  |  |
| (a)(4) The performance test requirements of §63.11092(a) do not apply   |  |  |

| Applicable Requirement Description   | Method(s), information, or facts used to determine the compliance status  | Is the facility in Compliance with the Applicable Requirements? |
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| to flares defined in §63.11100 and meeting the flare requirements in §63.11(b). The owner or operator shall demonstrate that the flare and associated vapor collection system is in compliance with the requirements in §63.11(b) and 40 CFR 60.503(a), (b), and (d).  | =   |   |
| (b) For each performance test conducted under paragraph (a)(1) of this section, the owner or operator shall determine a monitored operating parameter value for the vapor processing system using the procedures specified in paragraphs (b)(1) through (5) of this section.   | (b) A performance test is not required because gasoline loading is limited by permit to less than 250,000 gal/day. Therefore, there is no emission control required for the loading rack. | (b) Yes   |
| (b)(1) Each owner or operator of a bulk gasoline terminal subject to the provisions of this subpart shall install, calibrate, certify, operate, and maintain, according to the manufacturer's specifications, a continuous monitoring system (CMS) while gasoline vapors are displaced to the vapor processor systems specified in paragraphs (b)(1)(i) through (iv) of this section. During the performance test, continuously record the operating parameter as specified under paragraphs (b)(1)(i) through (iv) of this section. |   |   |
| (b)(1)(i) Where a carbon adsorption system is used, the owner or operator shall monitor the operation of the system as specified in paragraphs (b)(1)(i)(A) or (B) of this section.  |   |   |
| (b)(1)(i)(A) A continuous emissions monitoring system (CEMS) capable of measuring organic compound concentration shall be installed in the exhaust air stream.   |   | 2*  |
| (b)(1)(i)(B) As an alternative to paragraph (b)(1)(i)(A) of this section, you may choose to meet the requirements listed in paragraph (b)(1)(i)(B)(1) and (2) of this section.   |   |   |
| (b)(1)(i)(B)(1) Carbon adsorption devices shall be monitored as  |   |   |

| Applicable Requirement Description   | Method(s), information, or facts used to determine the compliance status | Is the facility in<br>Compliance with<br>the Applicable<br>Requirements? |
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| specified in paragraphs (b)(1)(i)(B)(1)(i), (ii), and (iii) of this section.   |  | 141  |
| (b)(1)(i)(B)(1)(i) Vacuum level shall be monitored using a pressure transmitter installed in the vacuum pump suction line, with the measurements displayed on a gauge that can be visually observed. Each carbon bed shall be observed during one complete regeneration cycle on each day of operation of the loading rack to determine the maximum vacuum level achieved.                   |  |  |
| (b)(1)(i)(B)(1)(ii) Conduct annual testing of the carbon activity for the carbon in each carbon bed. Carbon activity shall be tested in accordance with the butane working capacity test of the American Society for Testing and Materials (ASTM) Method D 5228-92 (incorporated by reference, see §63.14), or by another suitable procedure as recommended by the manufacturer.             |  |  |
| (b)(1)(i)(B)(1)(iii) Conduct monthly measurements of the carbon bed outlet volatile organic compounds (VOC) concentration over the last 5 minutes of an adsorption cycle for each carbon bed, documenting the highest measured VOC concentration. Measurements shall be made using a portable analyzer, in accordance with 40 CFR part 60, Appendix A-7, EPA Method 21 for open-ended lines. |  |  |
| (b)(1)(i)(B)(2) Develop and submit to the Administrator a monitoring and inspection plan that describes the owner or operator's approach for meeting the requirements in paragraphs (b)(1)(i)(B)(2)(i) through (v) of this section.  |  |  |
| (b)(1)(i)(B)(2)(i) The lowest maximum required vacuum level and duration needed to assure regeneration of the carbon beds shall be determined by an engineering analysis or from the manufacturer's recommendation and shall be documented in the monitoring and   |  |  |

| Applicable Requirement Description   | Method(s), information, or facts used to determine the compliance status | Is the facility in Compliance with the Applicable Requirements? |
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| inspection plan.   |  |   |
| (b)(1)(i)(B)(2)(ii) The owner or operator shall verify, during each day of operation of the loading rack, the proper valve sequencing, cycle time, gasoline flow, purge air flow, and operating temperatures. Verification shall be through visual observation or through an automated alarm or shutdown system that monitors and records system operation.  |  |   |
| (b)(1)(i)(B)(2)(iii) The owner or operator shall perform semi-annual preventive maintenance inspections of the carbon adsorption system according to the recommendations of the manufacturer of the system.  |  |   |
| (b)(1)(i)(B)(2)(iv) The monitoring plan developed under paragraph (2) of this section shall specify conditions that would be considered malfunctions of the carbon adsorption system during the inspections or automated monitoring performed under paragraphs (b)(1)(i)(B)(2)(i) through (iii) of this section, describe specific corrective actions that will be taken to correct any malfunction, and define what the owner or operator would consider to be a timely repair for each potential malfunction.  |  |   |
| (b)(1)(i)(B)(2)(v) The owner or operator shall document the maximum vacuum level observed on each carbon bed from each daily inspection and the maximum VOC concentration observed from each carbon bed on each monthly inspection as well as any system malfunction, as defined in the monitoring and inspection plan, and any activation of the automated alarm or shutdown system with a written entry into a log book or other permanent form of record. Such record shall also include a description of the corrective action taken and whether such corrective actions were taken in a timely manner, as defined in the monitoring and inspection plan, as well as an estimate of the amount |  |   |

| Applicable Requirement Description  | Method(s), information, or facts used to determine the compliance status | Is the facility in<br>Compliance with<br>the Applicable<br>Requirements? |
|---|--|--|
| of gasoline loaded during the period of the malfunction.  |  |  |
| (b)(1)(ii) Where a refrigeration condenser system is used, a continuous parameter monitoring system (CPMS) capable of measuring temperature shall be installed immediately downstream from the outlet to the condenser section. Alternatively, a CEMS capable of measuring organic compound concentration may be installed in the exhaust air stream. |  |  |
| (b)(1)(iii) Where a thermal oxidation system other than a flare is used, the owner or operator shall monitor the operation of the system as specified in paragraphs (b)(1)(iii)(A) or (B) of this section.  |  |  |
| (b)(1)(iii)(A) A CPMS capable of measuring temperature shall be installed in the firebox or in the ductwork immediately downstream from the firebox in a position before any substantial heat exchange occurs.  |  |  |
| (b)(1)(iii)(B) As an alternative to paragraph (b)(1)(iii)(A) of this section, you may choose to meet the requirements listed in paragraphs (b)(1)(iii)(B)(1) and (2) of this section.   |  |  |
| (b)(1)(iii)(B)(1) The presence of a thermal oxidation system pilot flame shall be monitored using a heat-sensing device, such as an ultraviolet beam sensor or a thermocouple, installed in proximity to the pilot light to indicate the presence of a flame.   |  |  |
| (b)(1)(iii)(B)(2) Develop and submit to the Administrator a monitoring and inspection plan that describes the owner or operator's approach for meeting the requirements in paragraphs (b)(1)(iii)(B)(2)(i) through (v)  |  |  |

| Applicable Requirement Description   | Method(s), information, or facts used to determine the compliance status | Is the facility in Compliance with the Applicable Requirements? |  |
|--|--|---|--|
| of this section.   |  |   |  |
| (b)(1)(iii)(B)(2)(i) The thermal oxidation system shall be equipped to automatically prevent gasoline loading operations from beginning at any time that the pilot flame is absent.  |  | 14  |  |
| (b)(1)(iii)(B)(2)(ii) The owner or operator shall verify, during each day of operation of the loading rack, the proper operation of the assist-air blower, the vapor line valve, and the emergency shutdown system. Verification shall be through visual observation or through an automated alarm or shutdown system that monitors and records system operation.  |  |   |  |
| (b)(1)(iii)(B)(2)(iii) The owner or operator shall perform semi-annual preventive maintenance inspections of the thermal oxidation system according to the recommendations of the manufacturer of the system.  |  |   |  |
| (b)(1)(iii)(B)(2)(iv) The monitoring plan developed under paragraph (2) of this section shall specify conditions that would be considered malfunctions of the thermal oxidation system during the inspections or automated monitoring performed under paragraphs (b)(1)(iii)(B)(2)(ii) and (iii) of this section, describe specific corrective actions that will be taken to correct any malfunction, and define what the owner or operator would consider to be a timely repair for each potential malfunction. |  |   |  |
| (b)(1)(iii)(B)(2)(v) The owner or operator shall document any system malfunction, as defined in the monitoring and inspection plan, and any activation of the automated alarm or shutdown system with a written entry into a log book or other permanent form of record. Such record shall also include a description of the corrective action taken and whether such corrective actions were taken in a timely manner, as   |  |   |  |

| Applicable Requirement Description   | Method(s), information, or facts used to determine the compliance status | Is the facility in Compliance with the Applicable Requirements? |
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| defined in the monitoring and inspection plan, as well as an estimate of the amount of gasoline loaded during the period of the malfunction.   | 36   |   |
| (b)(1)(iv) Monitoring an alternative operating parameter or a parameter of a vapor processing system other than those listed in paragraphs (b)(1)(i) through (iii) of this section will be allowed upon demonstrating to the Administrator's satisfaction that the alternative parameter demonstrates continuous compliance with the emission standard in §63.11088(a).  |  |   |
| (b)(2) Where a flare meeting the requirements in §63.11(b) is used, a heat-sensing device, such as an ultraviolet beam sensor or a thermocouple, must be installed in proximity to the pilot light to indicate the presence of a flame.  |  |   |
| (b)(3) Determine an operating parameter value based on the parameter data monitored during the performance test, supplemented by engineering assessments and the manufacturer's recommendations.   |  |   |
| (b)(4) Provide for the Administrator's approval the rationale for the selected operating parameter value, monitoring frequency, and averaging time, including data and calculations used to develop the value and a description of why the value, monitoring frequency, and averaging time demonstrate continuous compliance with the emission standard in §63.11088(a). |  | *:  |
| (b)(5) If you have chosen to comply with the performance testing alternatives provided under paragraph (a)(2) or paragraph (a)(3) of this section, the monitored operating parameter value may be determined according to the provisions in paragraph (b)(5)(i) or paragraph (b)(5)(ii) of this section.   |  |   |

| Applicable Requirement Description   | Method(s), information, or facts used to determine the compliance status | Is the facility in Compliance with the Applicable Requirements? |
|--|--|---|
| (b)(5)(i) Monitor an operating parameter that has been approved by the Administrator and is specified in your facility's current enforceable operating permit. At the time that the Administrator requires a new performance test, you must determine the monitored operating parameter value according to the requirements specified in paragraph (b) of this section.  |  |   |
| (b)(5)(ii) Determine an operating parameter value based on engineering assessment and the manufacturer's recommendation and submit the information specified in paragraph (b)(4) of this section for approval by the Administrator. At the time that the Administrator requires a new performance test, you must determine the monitored operating parameter value according to the requirements specified in paragraph (b) of this section. | ÷  |   |
| (c) For performance tests performed after the initial test required under paragraph (a) of this section, the owner or operator shall document the reasons for any change in the operating parameter value since the previous performance test.   | (c) N/A.   | (c) Yes   |
| (d) Each owner or operator of a bulk gasoline terminal subject to the provisions of this subpart shall comply with the requirements in paragraphs (d)(1) through (4) of this section.  | (d) N/A.   | (d) Yes   |
| (d)(1) Operate the vapor processing system in a manner not to exceed or not to go below, as appropriate, the operating parameter value for the parameters described in paragraph (b)(1) of this section.   |  |   |
| (d)(2) In cases where an alternative parameter pursuant to paragraph (b)(1)(iv) or paragraph (b)(5)(i) of this section is approved, each owner or operator shall operate the vapor processing system in a manner not to exceed or not to go below, as appropriate, the alternative operating parameter value.  | <i>₩</i>   | 8   |

| Applicable Requirement Description  | Method(s), information, or facts used to determine the compliance status | Is the facility in<br>Compliance with<br>the Applicable<br>Requirements? |
|---|--|--|
| (d)(3) Operation of the vapor processing system in a manner exceeding or going below the operating parameter value, as appropriate, shall constitute a violation of the emission standard in §63.11088(a), except as specified in paragraph (d)(4) of this section.   |  |  |
| (d)(4) For the monitoring and inspection, as required under paragraphs (b)(1)(i)(B)(2) and (b)(1)(iii)(B)(2) of this section, malfunctions that are discovered shall not constitute a violation of the emission standard in §63.11088(a) if corrective actions as described in the monitoring and inspection plan are followed. The owner or operator must: |  |  |
| (d)(4)(i) Initiate corrective action to determine the cause of the problem within 1 hour;   |  |  |
| (d)(4)(ii) Initiate corrective action to fix the problem within 24 hours;   |  |  |
| (d)(4)(iii) Complete all corrective actions needed to fix the problem as soon as practicable consistent with good air pollution control practices for minimizing emissions;   |  |  |
| (d)(4)(iv) Minimize periods of start-up, shutdown, or malfunction; and  |  |  |
| (d)(4)(v) Take any necessary corrective actions to restore normal operation and prevent the recurrence of the cause of the problem.   |  |  |
| (e) Each owner or operator subject to the emission standard in §63.11087 for gasoline storage tanks shall comply with the requirements in paragraphs (e)(1) through (3) of this section.  | (e) MPC will ensure completion of all required tank inspections.         | (e) Yes  |
| (e)(1) If your gasoline storage tank is equipped with an internal floating roof, you must perform inspections of the floating roof system according to the requirements of §60.113b(a) if you are complying   |  |  |

| Applicable Requirement Description   | Method(s), information, or facts used to determine the compliance status | Is the facility in<br>Compliance with<br>the Applicable<br>Requirements? |
|--|--|--|
| with option 2(b) in Table 1 to this subpart, or according to the requirements of §63.1063(c)(1) if you are complying with option 2(d) in Table 1 to this subpart.  |  |  |
| (e)(2) If your gasoline storage tank is equipped with an external floating roof, you must perform inspections of the floating roof system according to the requirements of §60.113b(b) if you are complying with option 2(c) in Table 1 to this subpart, or according to the requirements of §63.1063(c)(2) if you are complying with option 2(d) in Table 1 to this subpart.  |  |  |
| (e)(3) If your gasoline storage tank is equipped with a closed vent system and control device, you must conduct a performance test and determine a monitored operating parameter value in accordance with the requirements in paragraphs (a) through (d) of this section, except that the applicable level of control specified in paragraph (a)(2) of this section shall be a 95-percent reduction in inlet total organic compounds (TOC) levels rather than 80 mg/l of gasoline loaded.  |  |  |
| (f) The annual certification test for gasoline cargo tanks shall consist of the test methods specified in paragraphs (f)(1) or (f)(2) of this section.   | (f) N/A.   | (f) Yes  |
| (f)(1) EPA Method 27, Appendix A-8, 40 CFR part 60. Conduct the test using a time period (t) for the pressure and vacuum tests of 5 minutes. The initial pressure (Pi) for the pressure test shall be 460 millimeters (mm) of water (18 inches of water), gauge. The initial vacuum (Vi) for the vacuum test shall be 150 mm of water (6 inches of water), gauge. The maximum allowable pressure and vacuum changes ( $\Delta$ p, $\Delta$ v) for all affected gasoline cargo tanks is 3 inches of water, or less, in 5 minutes. |  |  |
| (f)(2) Railcar bubble leak test procedures. As an alternative to the   |  |  |

| Applicable Requirement Description  | Method(s), information, or facts used to<br>determine the compliance status  | Is the facility in<br>Compliance with<br>the Applicable<br>Requirements? |
|---|--|--|
| annual certification test required under paragraph (1) of this section for certification leakage testing of gasoline cargo tanks, the owner or operator may comply with paragraphs (f)(2)(i) and (ii) of this section for railcar cargo tanks, provided the railcar cargo tank meets the requirement in paragraph (f)(2)(iii) of this section.  |  |  |
| (f)(2)(i) Comply with the requirements of 49 CFR 173.31(d), 49 CFR 179.7, 49 CFR 180.509, and 49 CFR 180.511 for the periodic testing of railcar cargo tanks.   |  |  |
| (f)(2)(ii) The leakage pressure test procedure required under 49 CFR 180.509(j) and used to show no indication of leakage under 49 CFR 180.511(f) shall be ASTM E 515-95, BS EN 1593:1999, or another bubble leak test procedure meeting the requirements in 49 CFR 179.7, 49 CFR 180.505, and 49 CFR 180.509.  |  |  |
| (f)(2)(iii) The alternative requirements in this paragraph (f)(2) may not be used for any railcar cargo tank that collects gasoline vapors from a vapor balance system and the system complies with a Federal, State, local, or tribal rule or permit. A vapor balance system is a piping and collection system designed to collect gasoline vapors displaced from a storage vessel, barge, or other container being loaded, and routes the displaced gasoline vapors into the railcar cargo tank from which liquid gasoline is being unloaded. |  |  |
| 63.11093 – What notification  | ons must I submit and when?  |  |
| (a) Each owner or operator of an affected source under this subpart must submit an Initial Notification as specified in §63.9(b). If your facility is in compliance with the requirements of this subpart at the time the Initial Notification is due, the Notification of Compliance Status required under paragraph (b) of this section may be submitted in   | (a) MPC submitted the initial notification to Kansas Department of Health and the Environment, Bureau of Air and Radiation and EPA Region VII as required. | Yes  |

| Applicable Requirement Description  | Method(s), information, or facts used to determine the compliance status  | Is the facility in<br>Compliance with<br>the Applicable<br>Requirements? |  |  |
|---|---|--|--|--|
| lieu of the Initial Notification.   |   |  |  |  |
| (b) Each owner or operator of an affected source under this subpart must submit a Notification of Compliance Status as specified in §63.9(h). The Notification of Compliance Status must specify which of the compliance options included in Table 1 to this subpart is used to comply with this subpart.   | (b) This report serves as the Notification of Compliance Status for the St. Joseph Terminal.  | Yes  |  |  |
| (c) Each owner or operator of an affected bulk gasoline Terminal under this subpart must submit a Notification of Performance Test, as specified in §63.9(e), prior to initiating testing required by §63.11092(a) or §63.11092(b).   | (c) MPC submitted the notification of performance test before the test as required.   | Yes  |  |  |
| (d) Each owner or operator of any affected source under this subpart must submit additional notifications specified in §63.9, as applicable.  | (d) MPC will submit all additional notifications as required.   | Yes  |  |  |
| 63.11094 – What are my r  | ecordkeeping requirements?  |  |  |  |
| All Recordkeeping requirements have been addressed above. Please see responses above.   |   |  |  |  |
| 63.11095 – What are m   | y reporting requirements?   |  |  |  |
| All Reporting requirements have been addressed above.   | Please see responses above.   | Yes  |  |  |
| 63.11098 – What parts of the  | General Provisions apply to me?   |  |  |  |
| The owner/operator shall comply with general requirements of Subpart A according to Table 3 of Subpart BBBBBB. Subpart A applicability as follows:  1. §63.1 – Applicability 2. §63.2 – Definitions 3. §63.3 – Unit Standards and Abbreviations 4. §63.4 – Prohibited Activities and Circumvention 5. §63.5 – Preconstruction Review and Notifications 6. §63.6 – Compliance with Standards and | MPC is in compliance with applicable Subpart A requirements as follows:  1. §63.1 – No demonstration of compliance is required.  2. §63.2 – No demonstration of compliance is required.  3. §63.3 – No demonstration of compliance is required.  4. §63.4 – No demonstration of | Yes  |  |  |

#### Notification of Compliance Status Table

### 40 CFR Part 63 Subpart BBBBB Gasoline Distribution Area Source Rule Magellan Pipeline Company, LP (MPC) – St. Joseph Terminal

| Applicable Requirement Description   | Method(s), information, or facts used to determine the compliance status   | Is the facility in<br>Compliance with<br>the Applicable<br>Requirements? |
|--|--|--|
| Maintenance Requirements  7. §63.7 – Performance Testing Requirements  8. §63.8 – Monitoring Requirements  9. §63.9 – Notification Requirements  10. §63.10 – Record Keeping and Reporting Requirements  11. §63.11 – Control Device Requirements  12. §63.12 – State Authority and Delegations  13. §63.13 – Agency Addresses  14. §63.14 – Incorporation by Reference  15. §63.15 – Availability of Information and Confidentiality  16. §63.16 – Performance Track Provisions | compliance is required.  5. §63.5 – No demonstration of compliance is required.  6. §63.6 – The St. Joseph Terminal is compliant with all requirements of this regulation. No Startup, Shutdown, and Malfunction (SSM) Plan is required.  7. §63.7 – Not applicable to this facility  8. §63.8 – Compliance with this condition is satisfied via compliance with the related Subpart BBBBB requirement (§63.11092).  9. §63.9 – All notifications have been submitted as required.  10. §63.10 – All required recordkeeping is maintained and readily available for expeditious review; additionally, all required reporting has been made.  11. §63.11 – Not applicable to this facility  12. §63.12 – No demonstration of compliance is required  13. §63.13 – No demonstration of compliance is required  14. §63.14 – No demonstration of compliance is required |  |

| Applicable Requirement Description | Method(s), information, or facts used to determine the compliance status | Is the facility in<br>Compliance with<br>the Applicable<br>Requirements? |
|------------------------------------|--|--|
|                                    | 16. §63.16 – Not applicable to this facility                             |  |

### **ATTACHMENT III**

# Monthly Facility Leak Inspection Form 07-FORM-0016

#### MONTHLY LOADING RACK AND FACILITY LEAK INSPECTION FORM

| YEAR: |  |
|-------|--|
|-------|--|

#### Instructions:

- 1. Reference 7.13-ADM-067 Monthly Loading Rack Inspection Procedure for loading racks
- 2. Reference 7.13-ADM-063 Monthly Facility Leak Inspection Procedure for pumps, valves, fittings, and valve operators
- \*Finding: L = Leak Detection, NL = No Leak (If a leak is detected, complete the Leak Repair Log 06-FORM-0611.)
- \*\*Leak Detection Method: I = Instrumentation, S = Sight/Sound/Smell Record all leaks and repairs on leak log.

| Facility:             |          |                                       |   |                  | ·         |
|-----------------------|----------|---------------------------------------|---|------------------|-----------|
| Date of<br>Inspection | Finding* | Method**                              | Place Check Mark in Box to<br>Confirm Gasoline Loaded<br>during Inspection (For<br>Loading Racks Locations<br>Only) | Inspector's name | Signature |
|                       |          |                                       |   |                  | Ш         |
|                       |          |                                       |   |                  |           |
|                       |          |                                       | 8   |                  |           |
|                       |          |                                       | 8   |                  | ۸         |
|                       |          |                                       |   | ē                |           |
|                       |          |                                       |   |                  |           |
|                       | 27       |                                       | ř.  | c                |           |
|                       |          | 88                                    |   | g <u>e</u>       |           |
|                       |          |                                       |   |                  |           |
|                       |          |                                       |   | đ                |           |
|                       | -        |                                       |   | 8                | 3         |
|                       |          |                                       |   |                  |           |
|                       |          | · · · · · · · · · · · · · · · · · · · |   | =                |           |

All VCU/VRU maintenance and downtime still must be recorded on the VCU/VRU Maintenance Log.

Distribution: Location

Retention: 5 Years

**Monthly Loading Rack Inspection** 

07-FORM-0016 1/1/2010 Revision: 3

Leak Repair Log 06-FORM-0611
(Ensure ALL columns are completed when logging a repair. If a column

|                | (Ensure ALL columns are completed when logging a repair. If a column does not apply, enter N/A.) |   |   |               |   |                   |                |                                       |              |   |                  |           |
|----------------|--|---|---|---------------|---|-------------------|----------------|---------------------------------------|--------------|---|------------------|-----------|
| ate of pection | Equipment (Provide Descriptive Identification of Leaking Component)                              | is Leaking<br>Component in<br>Gasoline Service? | Nature of the Leak<br>(Vapor or Liquid) | Cause of Leak | Severity of<br>Leak: Drip,<br>Continual<br>Flow | Corrective Action | Repair Delayed | If Repair Delayed.                    | Final Repair | Reason Interval to Repair<br>Was Greater Than 15 Days |                  |           |
|                |  | Yes / No  |   |               |   |                   | Yes / No / N/A | , , , , , , , , , , , , , , , , , , , | Date         |   | Inspector's Name | Signature |
|                |  | Yes / No  |   |               |   |                   | Yes / No / N/A |                                       |              |   |                  |           |
|                |  | Yes / No  |   |               |   |                   | Yes / No / N/A |                                       |              |   |                  |           |
|                |  | Yes / No  |   |               |   |                   | Yes / No / N/A |                                       |              |   |                  |           |
|                |  | Yes / No  |   |               |   |                   | Yes / No / N/A |                                       |              |   |                  |           |
|                |  | Yes / No  |   |               |   |                   | Yes / No / N/A |                                       |              |   |                  |           |
|                |  | Yes / No  | Si                                      |               |   |                   | Yes / No / N/A |                                       |              |   |                  |           |
|                |  | Yes / No  |   |               |   |                   | Yes / No / N/A |                                       |              |   |                  |           |
|                |  | Yes / No  |   |               |   |                   | Yes / No / N/A |                                       |              |   |                  |           |
|                | =  | Yes / No  |   |               |   |                   | Yes / No / N/A |                                       |              |   |                  |           |
|                | Ē  | Yes / No  |   |               |   |                   | Yes / No / N/A |                                       |              |   |                  |           |
|                |  | Yes / No  |   |               |   |                   | Yes / No / N/A |                                       |              |   |                  |           |
|                |  | Yes / No  |   |               |   |                   | Yes / No / N/A |                                       |              |   |                  |           |

te \*: If an initial repair attempt is not made within 6 days of detection of a leak, or if the leak is not repaired within 15 days of detection, notify the Air Specialist. stribution: Location tention: 6 Years
1/1/2010 Revision: 0

### **ATTACHMENT IV**

### Annual In-service Tank Floating Roof and Seal Inspection Form 06-FORM-003

|            | IN-SERVICE INTERNAL FLOATING ROOF TANK FLOATING ROOF AND SEAL INSPECTION FORM 06-FORM-0003 Rev. 01/01/11 Revision Version; 5 Initial Inspection Post-Repair Inspection   |  |  |  |  |  |
|------------|--|--|--|--|--|--|
| 1          | Date: Location:  |  |  |  |  |  |
|            | inspector: Tank #  |  |  |  |  |  |
| 2          | Tank Description/Inspection  |  |  |  |  |  |
|            | Date of Construct:  Shell Capacity (http://pubmeter.google.com/pub |  |  |  |  |  |
|            | Roof Type: DOME CONE GEODESIC DOME OTHER   |  |  |  |  |  |
| 3          | Floating Roof Description  |  |  |  |  |  |
|            | Floating Roof Type: STEEL PONTOON DOUBLE DECK ALUMINUM STEEL PAN OTHER   |  |  |  |  |  |
| 4          | Primary Seal Type: MECHANICAL SHOE FOAM LOG WIPER OTHER  |  |  |  |  |  |
| ·          | Secondary Seal Type: NONE WIPER OTHER  |  |  |  |  |  |
| - 1        | INTERNAL FLOATING ROOF INSPECTION (INCLUDING GEODESIC DOMED TANKS)   |  |  |  |  |  |
| 5          | ***WARNING - CONFINED SPACE*** DO NOT ENTER TANK OR BREAK THE PLANE WITHOUT FOLLOWING THE APPROPRIATE CONFINED SPACE PROCEDURES.   |  |  |  |  |  |
|            | Was a visual inspection conducted through the roof hatch?  |  |  |  |  |  |
|            | 1. Was any Ilquid detected on the floating roof?   |  |  |  |  |  |
|            | 2. Was the roof floating on the product?   |  |  |  |  |  |
|            | (The floating roof should be floating on the liquid at all times, except when setting the legs for product changes or emptying / cleaning. The process of emptying and refilling when the legs are set on high legs shall be continuous and accomplished as rapidly as possible.)  |  |  |  |  |  |
|            | or emptying and remining when the regs are set on high legs shall be continuous and accomplished as rapidly as possible.)  3. Were you able to determine if the roof legs or cable-suspension system is set in the high position or low position (normal bottom)?  |  |  |  |  |  |
| ı          | YES NO COMMENTS  |  |  |  |  |  |
|            | If yes, was the: Roof in the high position Roof in the iow position  |  |  |  |  |  |
|            | (The roof should be in the low position except when the tank is to be emptied / cleaned.)  |  |  |  |  |  |
| ľ          | 4. Was there any evidence of damage to the primary seal (or secondary seal if present), such as tears, holes, or gaps?  YES NO COMMENTS Note any seal defects on drawing below.  |  |  |  |  |  |
| L          |  |  |  |  |  |  |
| 6          | POST REPAIR INTERNAL FLOATING ROOF INSPECTION (INCLUDING GEODESIC DOMED TANKS)   |  |  |  |  |  |
|            | 1. If product was detected on the floating roof how was it removed?  |  |  |  |  |  |
| ľ          | Desciption/Date of repair  |  |  |  |  |  |
| 1          | 2. If damage to the secondary seal was identified how was it repaired?   |  |  |  |  |  |
| 1          | Desciption/Date of repair  |  |  |  |  |  |
| ľ          | Jesciption/Date of repair  |  |  |  |  |  |
|            |  |  |  |  |  |  |
| 3          | 3. Attach post repair inspection form to this form.  |  |  |  |  |  |
|            | Date of post repair Inspection:  |  |  |  |  |  |
|            |  |  |  |  |  |  |
| , <u> </u> | Note on drawing the location, Comments:  |  |  |  |  |  |
|            | vidth and length of any visible  |  |  |  |  |  |
|            | pap or defect on the primary  N  |  |  |  |  |  |
|            | or secondary seals identified  |  |  |  |  |  |
|            | ther comment.  |  |  |  |  |  |
|            |  |  |  |  |  |  |
|            | Move access hatch as needed  |  |  |  |  |  |

9 INSPECTION FREQUENCY

- Consult CMS or your Air Specialist for frequency.

8 DISTRIBUTION: ORIGINAL - Location; COPY - Tank Integrity Group, Air Specialist

10 \*\*If the roof is landed on the legs or any defect is identified during this inspection, notify your Air Specialist and Tank Integrity immediatly.\*\*

Retention: 5 Years

### **ATTACHMENT V**

### Out-Of-Service Tank Floating Roof and Seal Inspection Form 06-FORM-004

### OUT-OF-SERVICE TANK FLOATING ROOF AND SEAL INSPECTION 06-FORM-0004 1/1/2010 Revision: 4

| 1       | Date:   |             |              |                                    | Ţ              | Location:  |  |              |              |                | J  |                      |
|---------|---|-------------|--------------|------------------------------------|----------------|--|--|--------------|--------------|----------------|--|----------------------|
|         | Inspector:                                      |             |              |                                    | <u> </u>       | Tank#  |  | <u></u>      |              |                |  |                      |
| 2       | Tank Descript                                   | tion        |              |                                    |                |  |  | _            |              |                | _  |                      |
|         | Date of Construc                                | tion:       |              | Normal Top (bbis):                 | e .            | Diameter (ft)                                    | ):   | Height (ft): |              |                | Product Grade:                               |                      |
|         | Roof Type:                                      | ∟<br>חספא   |              | ME □ CONE [                        | GEODEST        | TC DOME  | OTHER  | ,            |              |                | _  |                      |
|         | Shell:  | ] WELDE     | _            | RIVETED 0                          |                |  |  |              |              |                |  |                      |
| ا<br>1د | Floating Roof                                   |             |              | RIVELLO C                          | 1176.1         |  |  |              |              |                |  |                      |
| 1       |   |             |              | . PONTOON D                        | volini e DECK  | C ALUN   | MINLIM   | STEEL PAN    |              | OTHER          |  |                      |
| Į       |   |             |              |                                    | OUBLE DECI     |  | THEORY   | 3111117      |              | /////          |  |                      |
| 4       | Seal Description/Inspection  Primary Seal Type: |             |              |                                    |                |  |  |              |              |                |  |                      |
|         | Primary Seal Type                               |             |              | HANICAL SHOE                       |                |  | _  |              |              |                |  | -                    |
|         | Secondary Seal Ty                               | /pe:        |              | E WIPER                            |                | JBBER TIP  | OTHER  |              |              |                |  |                      |
|         | Condition of Prima                              | ary Seal:   | : 🗆          | GOOD HOLES                         | S TOP          | RN 🗆 GA  | APS INC  | PERABLE OR I | DAMAGE       | :D PUSHER      | S  |                      |
|         |   |             |              | NOT FLEXIBLE                       | ] METAL SH     | IELDS DAMAG                                      | ED OTH   | 1ER          |              |                |  | _                    |
|         | Condition of Second                             | ndeny Sr    | -al-         | □ 6000 □ н                         | nies 🔲 -       | TORN   | GAPS 0T  | HER          |              |                |  |                      |
|         | Condition or Secon                              | nuary oc    |              | □ NOT FLEXIBLE                     |                |  |  | HER          |              |                |  | _                    |
| L       |   |             |              | ☐ MOLLITATOT                       |                | IGED 31.02                                       |  | TEN          |              |                |  |                      |
| 5       | Floating Roof                                   |             |              |                                    |                |  | <b></b>  |              | ¬            |                |  |                      |
|         | 1. Are all openings                             | on the f    | loating n    | roof equipped with                 | a cover, ses   | al or Ild?                                       |  | ES NO [      |              |                | n vents and leg sleeves.)                    |                      |
|         | (All CUVEIS, SCAIS and                          | AD INCO SIA | Juliu De ini | The Gosea position                 | di an unico, . | засера чисти                                     | use. Tine one.                                   | J063 8610    | , Dioca-     | I voine,       | I willia and rog aleasay,                    |                      |
|         | 2. Access Hatch(s                               | ) (Note k   | cations o    | on drawing on page 4               | 4)             |  |  |              |              |                |  |                      |
|         |   |             |              |                                    |                | Т  | 1  |              |              |                | Repair                                       | Repair               |
|         | 1   |             |              |                                    |                | Gasket   |  |              |              | lepair         | Scheduled Completion                         | Completion           |
|         | Туре  |             | **           | Diameter                           | Quantity       | Good/Bad   | Comments   |              | Yes          | es/No          | Date   | Date                 |
|         | Bolted/Fastened co                              |             | keted        |                                    | <del> </del>   | <del> </del>                                     | <del>                                     </del> |              | ☐ Yes        |                |  |                      |
| Į       | Unboited cover, ga                              | •           | d            |                                    | <del></del>    | <del>                                     </del> |  |              |              | S No           |  |                      |
|         |   |             |              | ********************************** | <u>Г</u>       |  |  | NAME ATTE    |              |                |  |                      |
|         | Does the hatch(s) ex                            |             |              |                                    | _              | YES L  | 」NO □∽   | MMENIS       |              |                |  | -                    |
|         | 3. Anti-Rotation De                             | ivice (No   | ite locatio  | n on drawing on pag                | ge 4)          | 1  | 1  |              |              |                | T  | T                    |
|         |   |             |              |                                    | 1 '            |  |  |              | ∘ R          | epair          | Repair<br>Scheduled Completion               | Repair<br>Completion |
|         | Туре  |             |              |                                    | Quantity       | Size   | Comments   |              |              | es/No          | Date   | Date                 |
|         | Gauge Pole                                      |             |              |                                    | !              |  |  |              | Yes          | No No          | ļ  |                      |
|         | Flat Bar  | - 1         |              |                                    |                | <u> </u>   | ļ  |              | Yes          |                |  |                      |
|         | T-Bar   |             |              |                                    |                | <b> </b>   |  |              | Yes          |                | -  |                      |
|         | Pipe  |             |              |                                    |                | <del> </del>                                     |  |              | Yes          |                |  |                      |
|         | Cables  |             |              |                                    |                |  |  | 1            | ∐ Yes        | ∐ No           |  |                      |
|         | 4. Ladder (Note loca                            | ation on d  | Irawing or   | n page 4)                          |                |  |  |              |              |                |  |                      |
|         | ☐ Vertical Ladder                               | ONLY        |              | Rolling Ladder                     | (EFR and Ge    | odesic Dome                                      | Tanks)   |              | Con          | nbination C    | Sauge Well / Ladder                          | NONE                 |
|         | If Vertical Ladder Of                           | NI Y        |              |                                    |                |  | · · · · · · · · · · · · · · · · · · ·            |              | <del></del>  |                |  |                      |
|         | II VOLUCE: COURT                                |             |              |                                    |                |  | D  |              | <del>.</del> |                | Repair                                       | Repair               |
|         | 1   |             |              | 1                                  |                | Gasket   |  | 1            | Re           | epair          | Scheduled Completion                         | Completion           |
|         | Туре  |             |              |                                    | Quantity       | Good/Bad   | Comments   |              | Ye           | s/No           | Date   | Date                 |
|         | Sliding cover, gaske                            | eted        |              |                                    |                |  |  |              | ☐ Yes        | ☐ No           |  |                      |
|         | Sliding cover, ungas                            | sketed      |              |                                    |                |  |  |              | ☐ Yes        | ☐ No           | <u>                                     </u> |                      |
| 1.      |   |             |              |                                    |                |  |  |              |              |                |  |                      |
|         | 5. If Gauge Pole ON                             | LY or Co    |              |                                    |                |  |  |              |              |                |  |                      |
|         | is the gauge pole slott                         | ted?        | ı            | ∐ Yes                              | ☐ No           |  |  |              |              |                |  |                      |
| 1       | Gauge Pole Size:                                |             | s            | Slot Size:                         |                | Slot Spacing                                     |  |              |              |                |  |                      |
|         |   |             |              |                                    |                | Cankas   |  |              | De           | nale           | Repair<br>Scheduled Completion               | Repair<br>Completion |
| $\ $    | Туре  |             |              | 1                                  | Quantity       | Gasket<br>Good/Bad                               | Comments   |              |              | epair<br>es/No | Date Date                                    | Date                 |
| 11      | Sliding cover, gaske                            | eted        |              |                                    |                |  |  |              | ☐ Yes        | ☐ No           |  |                      |
|         | Sliding cover, ungas                            |             |              |                                    | -              |  |  |              | ☐ Yes        |                |  |                      |
| 1       | If slotted gauge pole                           |             |              | ı                                  | Emmision       | ns Sleeve  | Float  |              | ☐ Wip        |                |  |                      |
|         |   |             |              |                                    |                |  |  |              |              |                |  |                      |

**OUT-OF-SERVICE TANK FLOATING ROOF AND SEAL INSPECTION** 2 of 4 06-FORM-0004 1/1/2010 Revision: 4 Date: Location: Inspector: Tank # 6. Automatic Gauge Float Well (Note location on drawing on page 4) Repair Repair Repair Gasket Scheduled Completion Completion Good/Bad Yes/No Comments Date Date ☐ Yes ☐ No Bolted cover, gasketed ☐ Yes ☐ No Unbolted cover, gasketed Yes No Unboited cover, ungasketed ☐ NO ☐ COMMENTS Does the gauge float well extend below the liquid product? ☐ YES 7. Fixed Roof Column (Note location on drawing on page 4) Repair Repair Gasket Repair **Scheduled Completion** Completion Good/Bad Type (Check all that apply) Quantity Yes/No Date Comments Date ☐ Yes ☐ No Built-up Col. - Sliding cover, gasketed Yes INO Built-up Col. - Sliding cover, ungasketed ☐ Yes ☐ No Pipe-col. - Flex Fabric Sleeve Seal ☐ Yes ☐ No Pipe-col. - Sliding cover, gasketed ☐ Yes ☐ No Pipe-col. - Sliding cover, ungasketed 8. Floating Roof Legs (Note location on drawing on page 4) Type (Check all that apply) Quantity Size Comments Adjustable, Pontoon Area Adjustable, Center Area Adjustable, Double Area Cables (Cable Suspended roofs only) 9. Vacuum Breaker (Note location on drawing on page 4) Gasket Quantity Good/Bad Diameter Comments Type Weighted Mechanical Actuation, Gasketed Weighted Mechanical Actuation, Ungasketed Pressure Actuated (Enter # pres/vacuum vents) 10. Gauge-Hatch/Sample Well (Note location on drawing on page 4) Gasket Good/Bad Type Quantity Diameter Comments Weighted Mechanical Actuation, Gasketed Weighted Mechanical Actuation, Ungasketed Slit Fabric Seal - 10% Open 11. RIm Vents (Note location on drawing on page 4) Gasket Quantity Good/Bad Diameter Comments Type Weighted Mechanical Actuation, Gasketed Weighted Mechanical Actuation, Ungasketed 12. Drains (Note location on drawing on page 4) Gasket Quantity Good/Bad Diameter Comments Type Stub Drains Emergency Roof Drain 90% Fabric Cover Emergency Roof Drain Open ☐ YES ☐ NO ☐ COMMENTS Do drains extend below the liquid product? 13. Level Guage Float Comments ☐ Yes ☐ No Is the level gauge float attached to the floating roof?

☐ Yes ☐ No

☐ Yes ☐ No

inches

Can the float extend to the bottom?

How many inches below the deck does the cage extend?

Is the float in a cage?

\*\*\*\* Rember to take pictures of the float

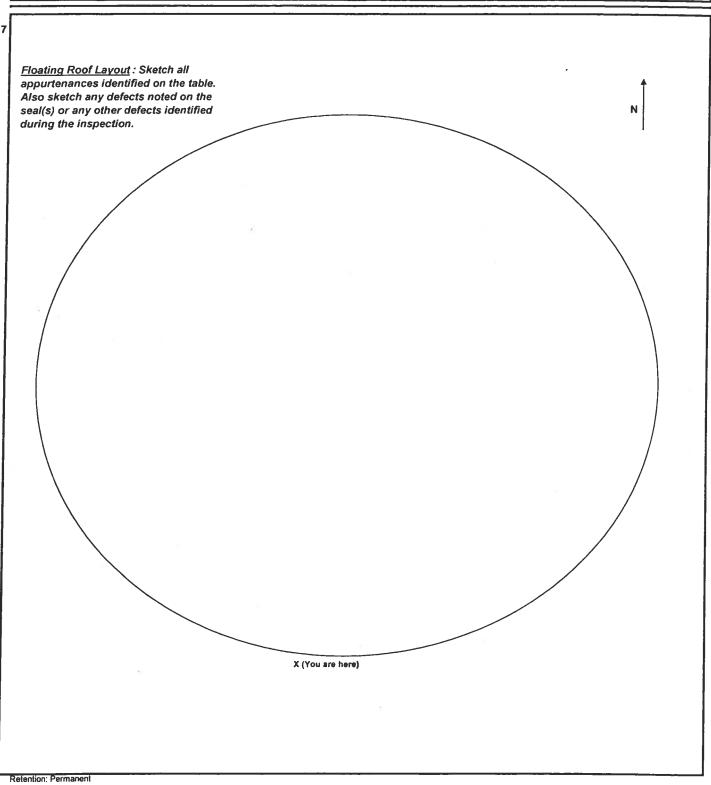
| OS.F | ORM | _ᲘᲘᲘ4 |  |
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1/1/2010 Revision: 4

| Date:  |                                       | Location:             |                     |  |  |  |  |  |
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| Inspector:   |                                       | Tank #                |                     |  |  |  |  |  |
|  |                                       |                       |                     |  |  |  |  |  |
| Floating Ro  | of Description                        |                       |                     |  |  |  |  |  |
|  |                                       |                       |                     |  |  |  |  |  |
| 1. Sketch all appurtenances on floating roof and assign each a mark on drawing on page 4 (A, B, C, etc.) |                                       |                       |                     |  |  |  |  |  |
|  | Mark Type Size                        | Radius Gom            | nemis - ()          |  |  |  |  |  |
|  |                                       |                       |                     |  |  |  |  |  |
|  | 8                                     |                       |                     |  |  |  |  |  |
|  | 5. <b>6</b>                           |                       |                     |  |  |  |  |  |
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| Ca.  | 2000                                  |                       |                     |  |  |  |  |  |
|  |                                       |                       |                     |  |  |  |  |  |
| 2. Describe  | in detail any additional problems for | ound and not describe | ed elsewhere.       |  |  |  |  |  |
|  |                                       |                       |                     |  |  |  |  |  |
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|  |                                       | . <u> </u>            |                     |  |  |  |  |  |
|  |                                       |                       |                     |  |  |  |  |  |
| 3. Comment   | s (Indicate if changing product from  | n what was stored PF  | RIOR to inspection) |  |  |  |  |  |
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| 1 | Date:      | Location: |  |
|---|------------|-----------|--|
|   | Inspector: | Tank#     |  |
| • |            |           |  |



Distribution: Location, Tank Integrity, Air Specialist